

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

DANIEL KANG, Plaintiff, vs. THE MAYOR AND ALDERMEN OF THE CITY OF SAVANNAH and ROY W. MINTER, JR., Chief of Police for the City of Savannah, Georgia, In His Individual and Official Capacities, Defendants. CIVIL ACTION NO. 4:21-CV-111-WTM-CLR

**VIDEOCONFERENCE DEPOSITION OF
LIEUTENANT JOSEPH TOTH**

August 31, 2022

2:40 p.m.

218 West State Street
Savannah, Georgia

Thomas J. Dorsey, RPR, CCR-2781

Gilbert & Jones

P. O. Box 1894 (31521)
1607 Norwich Street
Brunswick, GA 31520

gilbertandjones1@gmail.com
912.264.1670

P. O. Box 14515 (31416)
7505 Waters Avenue, F3
Savannah, GA 31406

APPEARANCES OF COUNSEL

On behalf of the Plaintiff:

MICHAEL G. SCHIAVONE, ESQ., (BY VIDEOCONFERENCE)
Schiavone Law Group, P.C.
1111 Bull Street
Savannah, Georgia 31401
(912) 232-2646
is law@bellsouth.net

JAMES H. WILSON III, ESQ.
Savage, Turner, Pinckney, Savage & Sprouse
102 East Liberty Street, 8th Floor
Savannah, Georgia 31401
(912) 231-1140
jwilson@savage lawfirm.net

On behalf of the Defendant The Mayor and Aldermen of
The City of Savannah:

PATRICK T. O'CONNOR, ESQ.
PATRICIA T. PAUL, ESQ.
Oliver Maner LLP
218 West State Street
Savannah, Georgia 31401
(912) 236-3311
pto@olivermaner.com

On behalf of the Defendant Roy W. Minter, Jr.:

TAYLOR L. DOVE, ESQ.
Hunter Maclean
200 East St. Julian Street
Savannah, Georgia 31401
(912) 695-6984
tdove@huntermaclean.com

Also Present:

Daniel Kang
Jamar Bacon
Mike Arango, (By Videoconference)

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3 EXHIBIT 17

1 (Reporter disclosure made pursuant to
2 Article 10.B. of the Rules and Regulations of the
3 Board of Court Reporting of the Judicial Council of
4 Georgia.)

5 LIEUTENANT JOSEPH TOTH,
6 having first been duly sworn, was examined and
7 testified as follows:

8 MR. SCHIAVONE: Okay. This is the
9 deposition of Joe Toth pursuant to the Civil --
10 Federal Civil Rules of Civil Procedure. All
11 objections except to the form are reserved. Is
12 that okay?

13 MR. O'CONNOR: That is agreeable. And
14 Lieutenant Toth will reserve reading and
15 signing.

16 MR. SCHIAVONE: All right.

17 EXAMINATION

18 BY MR. SCHIAVONE:

19 Q. Would you state your name, please, for the
20 record?

21 A. Yes, sir. It's Lieutenant Joseph Laszlo
22 Toth Jr., Savannah Police Department.

23 Q. All right, Lieutenant Toth. Can you tell
24 me what your duties are at the Savannah Police
25 Department?

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1 A. I'm currently the -- I guess the second in
2 command of the strategic investigation section which
3 consists of the gang unit, gun unit, the two SIU
4 teams and the TFOs that are assigned to the federal
5 agencies.

6 Q. And what were your duties, if you can
7 remember, in 2019, 2020?

8 A. I had the same duties. I had a different
9 commander and we were assigned under criminal
10 investigations at that time.

11 Q. All right. Were you the head of the SIS
12 warrant squad?

13 A. Yes, sir, for a short time.

14 Q. All right. Can you recall what that
15 period of time was?

16 A. I came over to the unit. I was reassigned
17 in February of 2020 and have been there since.

18 Q. Since then?

19 A. Yes, sir.

20 Q. All right.

21 A. Since February 2020.

22 Q. And back during that period was Dan Kang
23 and Mike Arango -- were they part of that unit?

24 A. Yes, sir. They were part of the warrant
25 squad.

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1 Q. And were they brought into that squad from
2 CNT?

3 A. I have limited understanding of -- of that
4 part of it because we didn't work together at those
5 times. I know I had spoken to them previously. I
6 know they were at CNT. After I was promoted to
7 lieutenant I was moved to central precinct where they
8 were there for a short period of time and then I
9 guess that's -- at some point they created warrant
10 squad, but I didn't have any direct knowledge of
11 that.

12 Q. And when you took that responsibility for
13 that squad, there wasn't any policies in effect, was
14 there, for that squad and how to perform their
15 duties?

16 A. Not specific to them, no.

17 Q. And do you remember Sergeant Arango being
18 concerned that there was a lack of policy and a lack
19 of manpower and equipment shortfalls?

20 A. I do.

21 Q. And do you recall that they actually -- he
22 actually prepared a policy that was considered by
23 superiors might be implemented for the -- for that
24 unit?

25 A. Yes, I was.

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1 Q. And was that ever implemented and made
2 part of the policy by the chief?

3 A. At the time that I was there before the
4 unit I guess disbanded it had not.

5 Q. And so tell me, what training were you
6 given and what training were these officers given on
7 the execution of warrants particularly for serious
8 violent offenders, arrest warrants and how to do
9 that, the danger involved and how to deal with
10 suspects? Was there any training given these
11 officers?

12 A. Yes, sir.

13 Q. Tell me about that. What was the
14 training?

15 A. Well, they were specifically, if I'm not
16 mistaken, all five of them at the time -- I'm not
17 sure. Marlow left at one point, so they were down to
18 four. They were all SWAT trained. They've all -- I
19 believe they all attended the SWAT school. They've
20 also been involved in numerous high-risk warrants and
21 things like that in the department.

22 Q. All right. With the training and the SWAT
23 unit and the high risk, would that be the same
24 training that they would use in the execution of the
25 warrant?

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1 A. It would depend on whether or not SWAT was
 2 actually called for and approved for them to act as a
 3 SWAT team.

4 Q. Well, so then why would all that training
 5 be relevant to the SIS warrant procedure?

6 A. As far as skill sets, tactics. Some of
 7 the tactics are the same. Whether or not you employ
 8 a full SWAT team to come out and exercise a warrant
 9 or something of that nature would be -- would be
 10 different.

11 Q. Well, when -- when these officers were
 12 asked to go and execute these warrants, was there a
 13 deficiency in the manpower?

14 Let me give you an example. I'm a
 15 criminal lawyer. I had a client that was accused of
 16 murder. There was an arrest warrant for his arrest.
 17 He came to my office, wanted to surrender himself, so
 18 I contacted SPD. I spoke with the lead detective and
 19 told him that this individual was at my office and
 20 that we wanted to turn him in and he would be here at
 21 my office. Well, the next thing I know, there's got
 22 to be -- I don't know -- three or four car loads of
 23 marshals, SPD, a lead detective, a number of other
 24 officers, quite a few officers that entered my office
 25 in order to execute that warrant.

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1 court, that I was an attorney, and I am voluntarily
 2 surrendering my client because I was told there was
 3 an arrest warrant for my client's arrest for the
 4 charge of murder signed by a superior court judge.
 5 And I understood that they are obligated to execute
 6 the warrant and that's why I contacted them.

7 I -- when they came to my office, I was
 8 told that it was protocol and procedure for this many
 9 officers because of the training and the need to be
 10 sure that they were all safe, that I was safe, and
 11 that everybody in my office was safe. Yet my
 12 understanding of this warrant squad back when you
 13 took it over didn't have hardly any people, any men,
 14 manpower to go out and do the same thing that they
 15 did at my office. And I get it. I understand why
 16 that kind of policy and procedure would be in place.

17 So my question to you is, your squad --
 18 and I'm not saying that you did anything wrong, but
 19 your squad was undermanned, wasn't provided
 20 resources, wasn't provided equipment, the type of
 21 equipment that they would need. My understanding is
 22 that they weren't given -- hold on one second. Let
 23 me look at my note.

24 Yeah. My understanding is that other than
 25 deadly force there's other forms of force that could

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1 Now, my understanding is that the SS --
 2 the SIS squad back when you took it over, there --
 3 they may have what, three, four officers and that was
 4 it to go and do this job?

5 MR. O'CONNOR: Object to the form.

6 Q. (By Mr. Schiavone) Is that a fair
 7 statement?

8 MR. O'CONNOR: Object to the form. You
 9 can answer.

10 I assume, Mike, you want him to answer
 11 that last question, not the first one?

12 MR. SCHIAVONE: Right, the last one. I
 13 was just giving an example.

14 Q. (By Mr. Schiavone) How many officers came
 15 to deal with a serious violent, potentially violent
 16 offender that there was a warrant accusing him of a
 17 very dangerous offense?

18 MR. O'CONNOR: You can answer subject to
 19 the objection.

20 THE WITNESS: Okay. Could you ask me the
 21 question one more time so I can be specific?

22 Q. (By Mr. Schiavone) Well -- well, it
 23 appeared to me that they didn't -- and this is not a
 24 question. This is an example.

25 They knew that I was an officer of the

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1 be used in order to get a suspect into custody if the
 2 situation arises. Among those are pepper balls, the
 3 super SOC. My understanding is all that was taken
 4 away from them when they entered the SIS warrant
 5 squad. Isn't that true?

6 MR. O'CONNOR: I'm going to object to the
 7 part before the question you just asked to the
 8 form.

9 Q. (By Mr. Schiavone) Weren't those items
 10 taken away from them?

11 A. If they were, that didn't happen when I
 12 was there that I recall. The -- there was some
 13 question at some point about pepper ball and its use,
 14 but I have a hard time answering that question just
 15 for the simple fact I don't recall if they -- what
 16 they may have taken away and what they didn't. It
 17 wasn't when I was there. I wasn't made aware of it.

18 Q. Well, they weren't provided things like
 19 masks in light of COVID, HIV, TB, spit guards. They
 20 weren't provided any of these, were they?

21 A. Yes.

22 Q. When were they provided those?

23 A. They were provided -- so we were informed
 24 that we had masks coming in right around the start of
 25 COVID. When the -- it took a little time to get them

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1 in. When I was notified one day that the -- I think
 2 it was Tracy Waldo was issuing them out. She had to
 3 leave early. I couldn't get over there in time to
 4 get them. I picked them up the second day because
 5 there was some concern by members of the unit of
 6 COVID.

7 At that point I provided them with that.
 8 We also -- there were numerous things that were
 9 brought up during a conversation between me and
 10 Sergeant Arango shortly after I got there about their
 11 needs. I have -- each one of those needs I've tried
 12 to fulfill.

13 We did get them spit masks. We got them
 14 for the whole unit. I don't recall the date. I can
 15 just tell you that it was done. We also -- whether
 16 it was computers. They had talked about certain mics
 17 that they wanted. I asked them if they would send me
 18 an RFE, which is a request for expenditure for those
 19 items. I don't recall how that ended up, but...

20 Q. All right. But most of these items were
 21 not provided to them when they went out to execute
 22 the arrest warrant for Darryl Faitele, were they? It
 23 was after the fact?

24 A. It may have been. I don't recall the time
 25 frame of those individual items. I know that it was

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1 brought to my attention that they needed things like
 2 personnel cars and other items, and I did what I
 3 could at my position to try to get those items for
 4 them.

5 Q. All right. Now, a lot of those items, for
 6 instance, the pepper spray or pepper ball, these --
 7 these would all be objects that could be used to
 8 de-escalate the situation, correct, when you're going
 9 to arrest someone?

10 A. Yes. They're tools that we use to -- to
 11 assist in making the arrest to use what -- you know,
 12 reasonable force.

13 Q. Right.

14 And you weren't -- you weren't in your
 15 position when the Pernell Drayton case occurred, were
 16 you? Does that ring a bell?

17 A. It rings a bell, but I believe that was
 18 before my time.

19 Q. All right. All right. And in reference
 20 to that case, your name came up. That happened in
 21 20 -- 2019. I think, is that Exhibit 5? And if you
 22 could show him Exhibit 5 for me.

23 A. I have it.

24 Q. All right. Let me look and see what page
 25 it is. I think it's the fourth page in. It's got a

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1 list of actions in reference to that case.

2 A. That's correct.

3 Q. Do you see that?

4 A. Yes, sir.

5 Q. All right. So -- so this, as I understand
 6 it, this was a use-of-force form that apparently
 7 officers have to file if any type of force is used in
 8 the course of the arrest. Does that sound fair?

9 A. Yeah, it's part of a -- a complete file,
 10 yes, sir.

11 Q. All right. Even if no one complains about
 12 it, right?

13 A. That's correct.

14 Q. You know, like a citizen or somebody else?

15 A. That's correct.

16 Q. Is that -- is that correct?

17 And that appears to be what occurred in
 18 this case. What I don't understand is it looked like
 19 the process was Dan -- Dan Kang used a -- the SOC
 20 method to secure this particular individual because
 21 apparently he was not listening to the commands.
 22 There were -- I don't know that you ever looked at
 23 the video or the factors that required them to do
 24 that in order to secure his arrest, but,
 25 nevertheless, it appears that his sergeant who at the

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1 time was Arango had to review it and he made a
 2 finding that the force was justified and that no
 3 department policy had been violated. Then apparently
 4 that goes up to Lieutenant Gavin. I'm sorry.

5 A. Garvin.

6 Q. Garvin -- I'm sorry -- who apparently
 7 doesn't do anything according to this which doesn't
 8 make any sense to me. That was on 8/13/2019. The
 9 incident happened on August 3rd, 2019. Then nothing
 10 happens with the lieutenant. It goes and eventually
 11 it gets to Lieutenant Barefield. This is some time
 12 in February of 2020 and nothing is done. Nobody
 13 accepts the conclusions of Sergeant Arango and at
 14 some point it comes to you, it looks like.

15 A. Yes, sir, it did.

16 MR. O'CONNOR: Hang on. I object to the
 17 form. You can answer.

18 Q. (By Mr. Schiavone) Do you recall
 19 receiving this?

20 A. I do.

21 Q. All right.

22 A. So just to go back one step before me
 23 where you explained that Lieutenant Garvin didn't do
 24 anything with it. It says in here from Garvin to
 25 Sergeant Arango that he was requesting the ARS

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1 reports and memo outlining the details behind the use
 2 of force. In other words, those were not included in
 3 what he submitted that needed to be for it to move
 4 forward.

5 Q. All right.

6 A. I'm just explaining that just because we
 7 do a memorandum from the supervisor. Once the
 8 supervisor reviews it there's a memorandum they
 9 produce on a use of force, not a show of force, just
 10 a use of force. From that point then it moves
 11 forward once the BWC's attached and the police
 12 reports and things like this.

13 Once -- once the chief terminated Sergeant
 14 Arango his blue team box, which evidently had
 15 additional items in it, was forwarded to me from
 16 Lieutenant Barefield. And when I looked at those
 17 items I noticed that it had already been previously
 18 been sent to Lieutenant Garvin and it was before I
 19 got there. Therefore that should have been reviewed
 20 and completed by Lieutenant Garvin, not by me, unless
 21 I was ordered to do so.

22 Q. All right. And but Lieutenant Garvin did
 23 do a finalized, didn't he? I mean, I don't see it in
 24 here.

25 A. Right.

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1 Q. But he did do it.

2 A. I can't answer that. All I can tell you
 3 is --

4 Q. Well --

5 A. -- what the responses are in here. And
 6 because once it came to me, like I said, it was under
 7 him being the commander of the unit and it was sent
 8 back to him for completion, to my understanding.

9 Q. All right. And that was sent by you back
 10 to him?

11 A. No. I'm not sure. I know that here it
 12 says it was closed out by IAPro User Lieutenant David
 13 Barefield and the incident was rerouted to Lieutenant
 14 Joseph Toth. The -- then it was sent. So at that
 15 point I guess, yeah, I did forward it according to
 16 this log, because Sergeant Arango wasn't here.
 17 Corporal Kang wasn't here. I forwarded it to -- I
 18 don't know. I talked to Captain Gay at some point,
 19 but we forwarded it to Sergeant Collard since he was
 20 also very familiar with, you know, the techniques
 21 that they used for him to review it. He then sent it
 22 back to me. I think I ended up talking to Captain or
 23 Lieutenant Barefield at the time and I think it was
 24 reassigned. But I can't -- he would have to answer
 25 that.

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1 Q. Well, since they had been fired at that
 2 point, no longer employees, why wouldn't somebody
 3 contact Garvin and accept whatever his conclusions
 4 were? I mean, we're going into almost two years.

5 A. Right. And I can't answer that. I don't
 6 know what occurred. I know that once they were gone
 7 the file was still open. It needs to be closed out
 8 for completion, and I don't know who handled that.

9 Q. Well, when you tried to send it to
 10 Sergeant Collard he made it clear, it looks like.

11 A. Correct.

12 Q. This is a year old and I was not present
 13 or assigned to this unit. Not sure it would be
 14 ethical for me to investigate this matter.

15 That's pretty strong language. I mean,
 16 this looks like there's something going on now in the
 17 department since these two guys had been fired.

18 I mean, why -- why would you send this to
 19 Collard? It wasn't his case. He has nothing to do
 20 with it.

21 MR. O'CONNOR: Object to the form. You
 22 can answer subject to the objection.

23 THE WITNESS: Okay. The -- it requires a
 24 sergeant who's investigating the complaint or --
 25 excuse me -- the use of force to do the

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1 memorandum. I don't recall if I talked with
 2 Captain Gates specifically on this. I talked to
 3 him about everything, but -- previously and I
 4 sent it to him for his expertise on the matter
 5 so that we had that document that's needed in
 6 the -- in the blue team entry that's required.

7 Q. (By Mr. Schiavone) All right. What was
 8 the date of that on that form that you sent it to
 9 Collard?

10 A. It looks like 8/3/2020 at 1420 hours.

11 Q. All right. And do you see anything else
 12 done?

13 A. There's a routing number 6 which is from
 14 Collard to me on 8/26/2020 at 11:35.

15 Q. All right.

16 A. And I think we had discussed it verbally
 17 where he said he didn't feel comfortable, and I
 18 understood what he had to say.

19 Q. All right. Were you aware that in April
 20 of 2021 quite a -- quite a long time after that last
 21 entry that Minter apparently ordered that Garvin do a
 22 letter of transmittal and another report? Were you
 23 aware of that?

24 A. No, sir.

25 MR. O'CONNOR: Object to form. You can

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1 answer.

2 THE WITNESS: No, sir. I was not. I
3 don't believe I was included in anything else
4 other than what we're up to here.

5 Q. (By Mr. Schiavone) All right. Then
6 you -- you were involved in the Darryl Faitele
7 investigation?

8 A. I was their supervisor at the time.
9 Yes, sir.

10 Q. All right. So you would have been
11 involved -- were you involved in the internal affairs
12 procedure?

13 A. I don't believe so. I don't recall if
14 they questioned me or talked to me at any point
15 during that, during their investigation. Once it's
16 turned over to them, you know, we kind of step back
17 and don't discuss the case anymore.

18 Q. Well, when's the next time you were
19 contacted about the case when they -- when internal
20 affairs became involved?

21 A. I can't be sure.

22 Q. Did -- were you required or did you review
23 the video of that incident?

24 A. I did.

25 Q. All right. Did you see anyone commit a
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1 crime in that video?

2 A. Could you be more specific?

3 Q. Yeah, anybody in the video. Did you see
4 anybody in the video commit a crime?

5 A. I don't know that I could answer that
6 question. I was looking at it from a --

7 Q. You're --

8 A. Well --

9 Q. You're a police officer.

10 A. Absolutely. I think that there were --
11 with regards to the incident itself I think that
12 there were things that could have been done
13 differently, but I'm looking at it from hindsight,
14 you know, on a video. I don't have the whole
15 perspective that the officers on scene would have
16 had. I couldn't see things that they saw around them
17 that they may have, you know, acted a certain way
18 towards, if that makes sense.

19 Q. Well, did you see them do anything wrong?

20 A. This is -- this is -- this is where it
21 gets tough for me for the simple fact that there's --
22 there's not a lot of patience. I think there could
23 have been more patience in it. Did they do things
24 wrong by policy? I believe that's correct. I know
25 they did, yes.

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1 Q. Well, enough to be fired?

2 A. That's not my call to make. I know -- I
3 know I made a rec -- I know I made a recommendation
4 and that --

5 Q. Right. What was that?

6 A. It was for suspension time.

7 Q. Five days for Kang and 15 for Arango?

8 A. That sounds about right. I haven't seen
9 the document in a while, but yes, sir.

10 Q. And was that consistent with other cases
11 and similar consequences when violating those
12 policies? Did y'all review other -- other cases to
13 make sure you're consistent?

14 A. Not -- not to my knowledge. I know that
15 we had a conversation about it between Major Adams,
16 myself, all those that were in the disciplinary
17 hearing. We all agreed that there were policy
18 violations, and based on those pol -- policy
19 violations we made recommendations and came up with
20 an agreement on what we felt would be reasonable in
21 this case as far as a suspension.

22 Q. All right. Well, let me see if this
23 brings back your memory in reference to the video.

24 The unit is sent out. They have a warrant
25 for the arrest of an individual charged with a
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1 violent offense, aggravated assault. They have a
2 general description in the paperwork that is given to
3 them. They have a light-skinned black male. They
4 have an address of where he presumably lives. They
5 go to that address. While they're knocking on the
6 door the super or maintenance man comes up to them
7 and asks them why they were there. They tell them
8 the name of the suspect, Darryl Faitele. He says --
9 I mean, Khalil Kelly. I'm sorry. I get confused on
10 it -- that Kelly lives there and/or did live there
11 but that he had moved to an apartment above in the
12 same complex. It's in -- it's in during the day so
13 broad daylight. So they're told the address that
14 he's moved to. So they have -- they have confirmed
15 this is where the suspect lives. They have a lawful
16 warrant by a superior court judge telling them to put
17 this person, literally his body into custody based
18 upon the -- the warrant. They go into the common
19 area. As they're walking through the common area you
20 can clearly see they're police officers. A
21 light-skinned black male and woman come up to the
22 rail at the second story, looks down at them and then
23 hurries into the apartment which is the address for
24 Kelly. He fits Kelly's description.

25 Now they -- would you agree at that point
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1 that now that the officers had been recognized that
 2 creates a very dangerous and serious?

3 MR. O'CONNOR: Object to form. You can
 4 answer subject to the objection.

5 THE WITNESS: Yes, sir.

6 Q. (By Mr. Schiavone) I mean --

7 A. Also, he's on a second story which gives
 8 him an advantage over the officers, yes.

9 Q. Absolutely.

10 So -- so -- so these officers have to make
 11 quick decisions, don't they, in reference on how to
 12 handle this?

13 A. Yes.

14 Q. All right. And when they get up to the
 15 door, now they -- they know two people are in the
 16 room. They don't know who else is in the room.

17 Would you -- I mean, it seems to me
 18 executing arrest warrants if officers are going to
 19 get killed, this is one of the more dangerous
 20 situations. Would you agree with that?

21 A. I would agree.

22 Q. Executing arrest warrants?

23 A. I would agree that it is a dangerous
 24 situation, yes, sir, knowing the information you knew
 25 on the -- on the suspect that you're looking for

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1 being involved in aggravated assault, yes.

2 Q. All right. So they get the door open and
 3 on the video -- I mean, you know, it speaks for
 4 itself. These officers see that there's more than
 5 two people in the room. There may be three, four,
 6 five, six. In fact, I think there were seven.

7 At that point they're really in a
 8 dangerous situation, aren't they, with seven
 9 different individuals in this room?

10 A. I'll agree.

11 Q. And in the room is what appears to be an
 12 AR-15 which is a deadly weapon, isn't it? We hear
 13 about this gun on the news all the time. It's a
 14 military weapon. It could have killed those officers
 15 immediately. Is that a fair statement? I mean, are
 16 you familiar with that gun?

17 A. I do recall that weapon. I don't know at
 18 what point it was seen, but yes. I agree that that
 19 could have posed a problem for them.

20 Q. All right. And so they got -- they
 21 have -- they're looking to secure Kelly. On the
 22 video Arango yells out Kelly's name three times. The
 23 suspect that they recognize from a distance,
 24 light-skinned black male comes moving toward them.

25 At that point this is a dangerous

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1 situation, isn't it?

2 A. I'll agree, yes.

3 Q. And the officer, Arango, yells out to this
 4 individual get down on the ground. He tells the
 5 individual to do that three times. The individual
 6 keeps coming at him.

7 Has the officer done anything wrong at
 8 this point based on your training for this unit?

9 A. If he's ordering somebody to come to him
 10 and to get on the ground, they have reason to believe
 11 that this is the individual that's wanted and all the
 12 other circumstances surrounding it, he has every
 13 right to detain that individual and confirm his
 14 identity, yes.

15 Q. All right. Wouldn't you agree that the
 16 individual's failure to obey the officer is an
 17 obstruction, a misdemeanor, committed in the
 18 officer's presence three times?

19 MR. O'CONNOR: Object to form and to legal
 20 conclusion. Subject to the objection, you can
 21 answer.

22 Q. (By Mr. Schiavone) Well, you as an
 23 officer, if you direct someone to do something -- you
 24 have a lawful right to do it -- and they refuse,
 25 that's obstruction, isn't it?

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1 MR. O'CONNOR: The same objection.

2 Q. (By Mr. Schiavone) How long have you been
 3 an officer?

4 A. For 28 years, sir.

5 Q. How many times have you arrested people
 6 for obstruction?

7 A. A few.

8 Q. All right. When you tell someone to do
 9 something and they refuse to do it in a very
 10 dangerous situation, isn't that obstruction as you
 11 understand Georgia law?

12 A. If the officer had -- if -- well, let's
 13 say this: If Corporal Kang and Sergeant Arango felt
 14 as though he had obstructed them at that point -- I
 15 remember seeing the video and it's been a long time
 16 ago. When I did I remember he did come out. He
 17 was -- he was -- my understanding was he was being
 18 compliant to a point. I don't know the time frame
 19 from when the commands were given versus what he did.
 20 I'm not saying it was unreasonable based on the fact
 21 that there were all these other individuals that
 22 allege -- that were actually in the apartment. For
 23 them to gain control, you know, it's a -- it's a
 24 discretionary call on his behalf whether or not he
 25 wants to say that this individual committed

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1 obstruction or not.
 2 Q. All right.
 3 A. If that makes --
 4 Q. But failure -- failure of the individual
 5 to obey the order get on the ground, if other people
 6 had weapons in the room, his life would be in danger
 7 as well as the officers' because he's blocking the
 8 officers. Isn't -- wouldn't that be a fair
 9 statement?

10 A. Yes, sir. I agree with that.

11 Q. They have to secure -- they have to secure
 12 everyone -- don't they? -- for their safety, for the
 13 people in the room's safety and for the public's
 14 safety? Isn't that what they're taught, even SWAT
 15 officers?

16 A. Well, you have to maintain control while
 17 you're in that situation. And if that means -- and
 18 you had two other detectives that were inside,
 19 actually inside that were maintaining control of
 20 those individuals inside the residence after
 21 Mr. Faitele was, you know, put down on the ground.

22 Q. All right. Did you see them do anything
 23 improper by putting them down at that point after
 24 asking three times to get on the ground and having
 25 already called the name of the suspect and he is --

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1 he is responding to it? Doesn't that make logical
 2 sense? He sees you from the -- he sees you on the
 3 porch. He's light-skinned black male. He rushes
 4 back into the apartment as if he recognizes you may
 5 be there for him. When you open the door and you
 6 yell out the name of the suspect in the warrant he's
 7 the one that responds to it. I mean, it seems even
 8 as -- I'm a criminal defense lawyer. It seems to me
 9 at that point he's -- he's the guy potentially in the
 10 warrant. And when he doesn't get on the ground, my
 11 client has committed an obstruction of them being
 12 able to do their job and execute a lawful warrant.
 13 I'd be thinking I've got big problems in defending
 14 this guy.

15 Now, they get him -- they get him down.
 16 He is struggling. He's not obeying them. They
 17 finally get his hands cuffed and they sit him up and
 18 when they ask him his name it's basically, you know,
 19 fuck you, motherfucker. That's my name. Okay? Is
 20 that on obstruct -- is that -- is that an
 21 obstruction --

22 MR. O'CONNOR: Object to the form.

23 Q. (By Mr. Schiavone) -- at that point --

24 MR. O'CONNOR: Object to the form of --

25 Q. (By Mr. Schiavone) -- as an officer when

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1 you ask somebody their name if they -- if they give
 2 you a false name?
 3 MR. O'CONNOR: Object to the form of the
 4 closing argument -- I'm sorry -- question.
 5 Q. (By Mr. Schiavone) Is that an
 6 obstruction? I've had plenty of my clients -- or is
 7 that a false statement? I've had plenty of my
 8 clients charged with false statements by police
 9 officers when asked their name.

10 MR. O'CONNOR: The same objection.

11 Q. (By Mr. Schiavone) Is that a crime,
 12 Lieutenant?

13 THE WITNESS: Am I answering?

14 MR. O'CONNOR: If you can. That's --

15 THE WITNESS: Okay.

16 MR. O'CONNOR: That's up to you.

17 THE WITNESS: I -- I think that they had
 18 every right to detain that young man. If he did
 19 not act in a certain way then they had every
 20 right to detain him. And if they decided that
 21 he committed an obstruction then they have the
 22 discretion to charge him with that -- with
 23 that -- with that obstruction.

24 Q. (By Mr. Schiavone) All right. I think
 25 that's fair, Lieutenant.

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1 Then he begins spitting on them, blood on
 2 them. Is that a simple battery? You know, they're
 3 worried about COVID. They're worried about HIV,
 4 these officers. I mean, they're -- they're
 5 first-line responders. They're worried about TB. I
 6 mean, that could have serious consequences to these
 7 officers' safety, couldn't it?

8 A. It could, and -- and I understand that
 9 that upset them. And I remember seeing on the video
 10 that Sergeant Arango pointed out that -- I don't
 11 remember if it was his shoe or his pant or something
 12 had a blood droplet on it he made reference to in the
 13 video.

14 Q. All right, Lieutenant. So after this
 15 event occurred, do you remember being ordered by was
 16 it Captain Gay or Lieutenant Gay back then? Do you
 17 remember?

18 A. It was Captain Gay was my immediate
 19 commander.

20 Q. All right. Do you remember him contacting
 21 you and telling you that he didn't want these
 22 officers to charge Faitele with those crimes?

23 A. I do not.

24 Q. Do you recall telling Arango not to do it?

25 A. I -- I recall Sergeant Arango and I had a

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1 conversation the day of at the hospital after he
 2 brought Mr. Faitele in for treatment and he said that
 3 he was not going to do -- he wanted to charge him
 4 with obstruction but wasn't going to do it at this
 5 time because of COVID and the jail wouldn't take him.
 6 And I agreed with him. We really couldn't move any
 7 further forward with that at that point because of
 8 the jail situation and COVID.

9 Q. All right. Just give me one second.

10 Do you recall after they had been put on
 11 administrative leave a week later contacting Arango
 12 and telling him that you had been directed by Gay
 13 not -- for him not to criminally charge Faitele?

14 A. I do not. I'm not saying that a hundred
 15 percent that didn't occur, but I -- I don't recall
 16 that.

17 I know at some point there was
 18 conversation about charging. I just don't remember
 19 during the internal investigation while they had it.

20 Q. And did you ask -- if you did do that, do
 21 you recall conversations with Gay that this was
 22 coming from Chief Minter?

23 A. Not specifically, no, sir.

24 Q. All right. If you had been told to tell
 25 Sergeant Arango not to do that, why -- why would an

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1 officer be told not to charge somebody with a crime?
 2 A. That's hard -- that's hard to answer,
 3 because, you know, I give my guys discretion. Unless
 4 they've made a really bad mistake that's up to them
 5 to make a charge or not. They're the one that has to
 6 bring it before the Court, not me. I'll give them
 7 guidance, but I don't -- I don't recall it being the
 8 way that you're saying as far as, you know, an order
 9 coming from the chief. I don't know if I -- I don't
 10 recall that myself.

11 Q. Well, if you were ordered by Gay to do
 12 that --

13 A. If he had --

14 Q. -- wouldn't you have questioned --
 15 wouldn't you have questioned Gay as to why you were
 16 being ordered to tell a police officer not to arrest
 17 somebody who committed a crime?

18 A. I'm sure we would have had the discussion,
 19 yes, sir.

20 Q. All right.

21 A. Yes, I would have asked. I mean, I'm very
 22 inquisitive. I wouldn't have just said, oh, okay.
 23 Yes, sir, and gone about my day.

24 Q. Well, if that happened -- and you're
 25 saying you just don't remember, but if it did happen,

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1 did you ever find -- do you remember ever hearing why
 2 you may have been ordered to tell Arango not to do
 3 that?

4 MR. O'CONNOR: Object to form. You can
 5 answer.

6 THE WITNESS: Okay.

7 I honestly don't recall. I don't want to
 8 say something that's -- that would be, you know,
 9 wrong in this case or that I don't recall. I
 10 don't want to speculate.

11 Q. (By Mr. Schiavone) All right. Just give
 12 me one second.

13 A. Yes, sir.

14 (Pause.)

15 THE REPORTER: Same transcript orders as
 16 yesterday?

17 MR. O'CONNOR: Yes for us.

18 MR. DOVE: (Nods head.)

19 THE REPORTER: Same thing?

20 MR. WILSON: (Nods head.)

21 MR. SCHIAVONE: Hey, I'm sorry. I lost
 22 the pic -- I lost the picture and everything.

23 Q. (By Mr. Schiavone) So Lieutenant -- it's
 24 Lieutenant -- is that right? -- or Captain? I'm
 25 sorry.

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1 A. No, it's Lieutenant. Yes, sir.

2 Q. All right. Lieutenant Toth, why did you
 3 have a particular problem -- a problem with Officer
 4 Kang?

5 A. I don't understand what that question
 6 means.

7 Q. Were you during this period, were you
 8 upset with Kang about other things than this
 9 particular case?

10 A. I wouldn't say upset with. There was a
 11 situation that was brought to my attention that
 12 happened around St. Patrick's Day weekend, I think,
 13 when he was assigned to SWAT. It was a little
 14 incident in our building.

15 Q. All right. Well, let me ask you, you sent
 16 these rec -- recommendations to Chief Minter. Were
 17 you aware that they were following -- seeing a draft
 18 policy on how they did the investigation rather than
 19 policies that were already implemented with -- with
 20 the police department? Were you aware of that, the
 21 chief was?

22 MR. DOVE: Object to form.

23 THE WITNESS: I can say that I know what
 24 the policy was at the time. I don't know what
 25 he was utilizing at that time. I know that I

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1 was sent something in reference to the
 2 mitigation hearing and at some point Sergeant
 3 Arango had sent me a text asking me what -- what
 4 this was, what the mitigation hearing was. And
 5 I told him I don't know. This is the first time
 6 I've heard of it. And I think I referred him to
 7 get with Lieutenant Barefield because I had no
 8 knowledge of it myself. It was new.

9 MR. SCHIAVONE: All right. So you had
 10 never heard of a mitigation hearing in the -- in
 11 the appeal process under the Savannah policies?
 12 I think that I could tell you -- can you show
 13 him Exhibit 1 and Exhibit 2?

14 MR. O'CONNOR: The court reporter will
 15 pull them. Yes.

16 Q. (By Mr. Schiavone) If you'll take a look
 17 at that. Exhibit 1, as I understand it, was the
 18 existing policy. Exhibit 2 was a draft policy that
 19 had never been implemented. Do you -- have you ever
 20 seen Exhibit 2?

21 MR. O'CONNOR: Object to form. But you
 22 can answer.

23 THE WITNESS: If it was not sent out to us
 24 for review then no, I have not. And I -- I
 25 don't understand why this date on here is

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1 crossed out. Does that mean it's a draft or --
 2 Q. (By Mr. Schiavone) My understanding is
 3 that was -- that was a draft.

4 A. Okay. No, if it hadn't been completed and
 5 revised then we wouldn't have seen it or I wouldn't
 6 have seen it.

7 Q. All right. You had been in internal
 8 affairs before, hadn't you?

9 A. Yes, sir.

10 Q. At some point in your career?

11 A. Yes, sir. Yeah, I was.

12 Q. So you know how the process works?

13 A. Yes, sir.

14 Q. Now, is every police officer including the
 15 chief required to follow policy?

16 A. We are required to follow policy. Yes,
 17 sir.

18 Q. Does that include the chief?

19 A. I would think so if he's the leader of the
 20 organization, yes, sir.

21 Q. And would it be consistent for the
 22 superior officer to not follow policy but expect the
 23 subordinate officers to follow policy? That wouldn't
 24 make sense, would it --

25 A. No. That would be --

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1 Q. -- in your mind?

2 A. No. That would be an example of not
 3 leading by example.

4 Q. And that would be a violation of policy,
 5 wouldn't it?

6 A. Yes, sir.

7 Q. And in this case there -- in Exhibit 1
 8 this is to put the officers on notice as to what
 9 their rights are -- isn't it? -- and what to expect
 10 and how the process works in terms of the
 11 investigation?

12 MR. O'CONNOR: Object to the form. You
 13 can answer.

14 THE WITNESS: Yes, sir. This is one way
 15 to explain it to them so that there's no
 16 surprises.

17 Q. (By Mr. Schiavone) Okay. And these
 18 officers should be able to rely on that policy that
 19 they'll be given due process and treated fairly like
 20 everyone else. Would that be a fair statement in the
 21 implementation of -- the implementation of the policy?

22 A. Yes.

23 Q. And part of that policy, as I understand
 24 it, it requires the Douglas Factors to be considered.
 25 And do you know what the Douglas Factors are?

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1 A. I don't -- I don't have them memorized,
 2 but, yes, I'm familiar with. It's a tool to help
 3 weigh discipline and whether or not, you know, the
 4 officer can be saved.

5 Q. And the -- there was also a progressive
 6 punishment that's in the city policy. Are you
 7 familiar with that?

8 A. The progressive discipline policy, yes,
 9 sir.

10 Q. All right. And all of those are supposed
 11 to be followed under that policy, aren't they?

12 A. To my understanding, yes.

13 Q. All right. But there's nothing in
 14 Exhibit 1 that I'm aware of that creates a mitigation
 15 hearing. Like you, that was the first I'd ever heard
 16 of it.

17 A. Yes, sir.

18 Q. So if the chief was creating his own
 19 policy and creating mitigation hearings and things of
 20 that nature, that would be to the disadvantage of the
 21 officer if it hadn't been implemented as an existing
 22 policy, wouldn't it?

23 MR. O'CONNOR: Object --

24 MR. DOVE: Object to form.

25 MR. O'CONNOR: The same objection.

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1 Go ahead.
 2 THE WITNESS: I'm trying to think of the
 3 right way to answer this. Not the right way,
 4 but the way to answer this.
 5 I would think that it's not in the policy
 6 it's something new that we're doing. It could
 7 be a way to determine more information from the
 8 officer without using Douglas Factors. I
 9 don't -- I can't really answer that question.
 10 I...
 11 Q. (By Mr. Schiavone) Well, what's the --
 12 what's the sense in having policy if you don't follow
 13 it?
 14 A. Absolutely. I agree with that.
 15 Q. All right. And if you have a draft that
 16 has never been implemented, how -- do you think
 17 that's fair --
 18 A. No.
 19 Q. -- to you or to any other officer?
 20 A. No, I do not.
 21 Q. Yeah.
 22 And so were you surprised when Minter
 23 didn't accept your recommendations on punishment in
 24 the Faitele case and went straight to termination?
 25 A. I was surprised, yes.

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40

1 Q. And my -- would it be fair to say that
 2 y'all looked at all of the different punishments and
 3 followed the procedures in making your
 4 recommendation?
 5 A. I would hope that we did, yes.
 6 Q. All right. Just give me one second.
 7 A. Yes, sir.
 8 (Pause.)
 9 MR. SCHIAVONE: Pat, that's all the
 10 questions I have of him. Thanks.
 11 MR. O'CONNOR: Okay. I have no questions
 12 for the City.
 13 MR. DOVE: I do not have any questions as
 14 well.
 15 MR. O'CONNOR: That's it.
 16 MR. SCHIAVONE: Lieutenant Toth, thank
 17 you.

18 THE WITNESS: All right. Thank you,
 19 Mr. Schiavone.
 20 (Deposition concluded at 3:30 p.m.)
 21 (Pursuant to Rule 30(e) of the Federal
 22 Rules of Civil Procedure and/or O.C.G.A. 9-11-30(e),
 23 signature of the witness has been reserved.)

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2
 3 STATE OF GEORGIA:
 4 COUNTY OF EFFINGHAM:
 5

6 I hereby certify that the foregoing
 7 transcript was reported as stated in the caption and
 8 the questions and answers thereto were reduced to
 9 writing by me; that the foregoing 40 pages represent
 10 a true, correct, and complete transcript of the
 11 evidence given on August 31, 2022, by the witness,
 12 LIEUTENANT JOSEPH TOTH, who was first duly sworn by
 13 me.

14 I certify that I am not disqualified
 15 for a relationship of interest under
 16 O.C.G.A. 9-11-28(c); I am a Georgia Certified Court
 17 Reporter here as an employee of Gilbert & Jones, Inc.
 18 who was contacted by Savage & Turner to provide court
 19 reporting services for the proceedings; I will not be
 20 taking these proceedings under any contract that is
 21 prohibited by O.C.G.A. 15-14-37(a) and (b) or
 22 Article 7.C. of the Rules and Regulations of the
 23 Board; and by the attached disclosure form I confirm
 24 that neither I nor Gilbert & Jones, Inc. are a party
 25 to a contract prohibited by O.C.G.A. 15-14-37(a) and
 26 (b) or Article 7.C. of the Rules and Regulations of
 27 the Board.

28 This 3rd day of September 2022.

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